

Hearing Date: January 11, 2012
Time: 10:00 a.m. (EST)
Location: New York, New York
Objection Deadline: January 4, 2012 at 4:00 p.m.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS, INC., *et al.*,

Debtor.

Chapter 11

Case No. 08-13555 (JMP)
(Jointly Administered)

**NOTICE OF MOTION FOR ENTRY OF AN ORDER PURSUANT TO
SECTION 362(d) OF THE BANKRUPTCY CODE AND BANKRUPTCY
RULE 4001 TO LIFT THE AUTOMATIC STAY TO PERMIT
BENISASIA INVESTMENT AND PROPERTIES LIMITED TO
PROSECUTE CERTAIN CAUSES OF ACTION IN STATE OR FEDERAL COURT**

PLEASE TAKE NOTICE that a hearing on the annexed motion and its supporting declaration and exhibits (the "Motion") to permit Benisasia Investment and Properties, Ltd. ("Benisasia") relief from the automatic stay pursuant to section 362(d)(1) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 4001 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") to commence certain causes of action in state or federal

court against debtor Lehman Brothers Holdings Inc. ("LBHI"), all as more fully set forth in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Room 601 of the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), One Bowling Green, New York, New York 10004, on January 11, 2012 at 10:00 a.m. (prevailing Eastern time) (the "Hearing").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the name of the objecting party, the basis of the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers) and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202, Attn: Stephen A. Donato, Esq., attorneys for Benisia; (iii) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard P. Krasnow, Esq., attorneys for the Debtors; (iv) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., B. Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.), and (v) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq., attorneys

for the Official Committee of Unsecured Creditors appointed in this case so as to be so filed and received by no later than **January 4, 2012 at 4:00 p.m. (EST)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that the date of the Hearing may be adjourned to a future date and or in time in open court without further notice.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested therein shall be deemed unopposed, and may be granted by the Bankruptcy Court without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and that failure to appear may result in relief being granted or denied upon default.

Dated: December 20, 2011
Syracuse, New York

BOND, SCHOENECK & KING, PLLC

By: 

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